

March 14, 2003

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Submitted via [ECHO@EPA.GOV](mailto:ECHO@EPA.GOV)

**Re: Enforcement and Compliance History On-line (ECHO) Website**

Please consider this comment regarding the Enforcement and Compliance History On-line (ECHO) Website. Morganite Incorporated is a subsidiary company of Morgan Crucible PLC. I refer in this response to another sister company, Morgan Advanced Ceramics.

The facility listings in the ECHO website sometimes inappropriately link and confuse facilities that operate (or have operated) at the same site. It appears that the ECHO database cross-indexes facilities by site address, even when the facilities or companies are unrelated.

A search for Morgan facilities brings up the "Ball Metal Beverage Container Corporation, 2425 Whipple Road, Hayward, California", among 136 other facilities that have some reference to "Morgan" in their entries. I happened to notice that this is the location of our new Morgan Advanced Ceramics facility, so I clicked for more information. The entry for the Ball Metal Beverage Container Corporation lists the hazardous waste EPA ID number for Morgan Advanced Ceramics, presumably because they were both located in the same building, but at different times. Morgan Advanced Ceramics leases the building from a landlord who previously leased the building to the beverage container company, but the beverage container company was closed several years before Morgan moved in. Morgan Advanced Ceramics has no relationship with the previous tenant. There is no entry in ECHO for Morgan Advanced Ceramics other than the Ball Metal Beverage Container entry.

Linking facilities because they have occupied the same site (perhaps as successive tenants) is confusing and misleading.

Best Regards,

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